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February 28, 2012

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, D.C. 20554

Re: EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2011

Dear Ms. Dortch:

On behalf of SI Wireless, LLC, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification for 2011 with accompanying statement

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,

Panela L. Sist

Pamela L. Gist

Enclosure

cc: Best Copy and Printing, Inc.

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification covering calendar year 2011

Date filed: February 28, 2012

Name of company covered by this certification:

SI Wireless, LLC

Form 499 Filer ID: 828504

Address:

P.O. Box 1359

Mt. Vernon, Illinois 62859

Name of signing officer: Michael Beehn

Title of signatory: Chief Operating Officer

### CERTIFICATION

I, Michael Beehn, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Name: Michael Beehn

Title: Chief Operating Officer

Date: 2/27/12

Attachment: Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

#### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier educates and trains its employees regarding the appropriate use of CPNI. Carrier
  will provide annual policy training for all employees and individual training for new
  employees. Employees are provided with a continually updated corporate policy that
  enables/enforces compliance with CPNI protection regulations. Carrier has established
  disciplinary procedures should an employee violate the CPNI procedures established by
  Carrier.
- Carrier does not allow the use of CPNI for any purposes other than servicing customers
  of CMRS services. The company is committed to establishing a system whereby the
  status of a customer's CPNI approval can be determined prior to the use of CPNI for
  marketing of services not immediately related to current services.
- Carrier maintains a record of its sales and marketing campaigns that use its customers'
  CPNI. Though prohibited by the company at this time, the Carrier is committed to
  maintaining required future records of any and all instances where CPNI is disclosed or
  provided to third parties, or where third parties were allowed access to CPNI. The record
  includes a description of each campaign, the specific CPNI that was used in the
  campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI to ensure that the CPNI is used only for purposes not requiring customer opt-in/opt-out procedures, and a process ensures that opt-out elections are recorded and followed if not within CMRS.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established rules that are identified as in compliance with the requirements of applicable Commission rules.
- As developed, Carrier will ensure that customers will be notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

•	Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
•	Carrier took the following actions against data brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission:
	None have been Required
•	The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI:
	No Experience with Pretexters, We have only operated for 90 days
•	The following is a summary of all customer complaints received in 2011 regarding the unauthorized release of CPNI:
	<ul> <li>Number of customer complaints Carrier received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 0</li> </ul>
	- Category of complaint:
	0 Number of instances of improper access by employees
	_0_ Number of instances of improper disclosure to individuals not authorized to receive the information
	0 Number of instances of improper access to online information by individuals not authorized to view the information
	0 Number of other instances of improper access or disclosure
	- Summary of customer complaints received in 2011 concerning the unauthorized release of CPNI:0_